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14
15 UNITED STATES DISTRICT COURT
16 FOR THE DISTRICT OF NEVADA

17
18 ENRIQUE MARTINEZ, MICHELLE
MARTINEZ, and SUNSHINE
19 MARTINEZ-VALDEZ, individually and
on Behalf of a Class of Similarly Situated
20 Individuals,

21 Plaintiffs,

22 vs.

23 MXI CORP, et al.,

24 Defendants.
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COUNSEL/PARTIES OF RECORD	
MAR 29 2016	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY

Case No. 3:15-cv-00243-RCJ-VPC

**STIPULATED MOTION TO EXTEND
CASE DEADLINES AND STAY
DISCOVERY**

1 Plaintiffs Enrique Martinez, Michelle Martinez, and Sunshine Martinez-Valdez
2 (collectively, "Plaintiffs") and Defendants MXI Corp., Martin J. Brooks, Jeanette L.
3 Brooks, Andrew Brooks, Dr. Gordon Pedersen, Connie Hollstein, Sherman Smith, Ruth
4 Smith, William "Butch" Swaby, Carolyn Swaby, Felix Gudino, Lisa Gudino, Glen
5 Overton, Kim Overton, Adam Paul Green, Melannie Green, Jeremy Reynolds, Karen
6 Reynolds, Derrick Winkel, Naomi Winkel, Paul Engemann, Suzanne Engemann, Paula
7 Pritchard, Kathleen Robbins, Ian Murray, Judy Murray, Sandy Chambers, and Kerry Dean
8 (collectively, "Defendants," and with Plaintiffs, the "Parties"), by and through their
9 undersigned counsel, hereby submit this Stipulated Motion to Extend Case Deadlines and
10 Stay Discovery.

11 The Parties respectfully request that the Court approve the following extensions:

12 1. Deadline for Defendants to Answer the Complaint: The Parties respectfully
13 request that the Court extend the deadline for Defendants to answer the Complaint from
14 April 7, 2016 to May 9, 2016.

15 2. Un-Expired Deadlines in the Joint Case Management Report: The Parties
16 respectfully request that the Court extend by 30 days each un-expired deadline in the
17 Parties' Revised Joint Case Management Report. [Dkt. 91 at 9.]

18 The Parties further request that the Court stay discovery in this matter until April
19 25, 2016, except that the Parties must respond to any outstanding written discovery. No
20 depositions, however, will take place before April 25, 2016.

21 The Parties are engaged in settlement discussions, and the requested extensions and
22 stay will give the Parties additional time and resources to focus on reaching settlement.
23 This Motion is made in good faith, and also arises in part out of the difficulty and expense
24 of completing depositions with multiple Parties located out-of-state.
25
26

1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

2 Dated: March 25, 2016

3 DICKINSON WRIGHT PLLC

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Karen Reynolds, Derrick Winkel, Naomi
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ORDER

IT IS SO ORDERED.

Dated: March 29, 2016.


United States Magistrate Judge

CERTIFICATE OF SERVICE

I certify that I am an employee of QUARLES & BRADY and that on this date the within document entitled Stipulated Motion to Extend Deadlines and Stay Discovery was electronically filed with the Clerk of the Court using the CM/ECF system, which will automatically e-serve the same on the attorney of record set forth below:

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DATED this 25th day of March, 2016.

/s/ Debra L. Hitchens